

MICHAEL A. JACOBS (CA SBN 111664)
MJacobs@mofo.com
ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzalez@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105-2482
Telephone: 415.268.7000
Facsimile: 415.268.7522

KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsflp.com
HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsflp.com
BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
Washington DC 20005
Telephone: 202.237.2727
Facsimile: 202.237.6131

WILLIAM CARMODY (*Pro Hac Vice*)
bcarmody@susmangodfrey.com
SHAWN RABIN (*Pro Hac Vice*)
srabin@SusmanGodfrey.com
SUSMAN GODFREY
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019-6023
Telephone: 212.336.8330
Facsimile: 212.336.8340

Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
MICHELLE YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
THEIR OPPOSITION TO WAYMO'S
MOTION TO COMPEL STROZ-
RELATED DISCOVERY**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File Under Seal Their Opposition to Waymo's Motion To Compel Stroz-Related Discovery.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit C	Highlighted Portions	Defendants (Blue)
Exhibit L	Highlighted Portions	Plaintiff (Green)

3. The blue-highlighted portions of Exhibit C to the Rivera Declaration contain confidential personal information of a certain employee. Defendants request this information be kept under seal to protect individual privacy interests because this lawsuit is currently the subject of extensive media coverage. I understand that disclosure of this information could expose this individual to harm or harassment.

4. The green-highlighted portions of Exhibit L to the Rivera Declaration contain information that has been designated "Highly Confidential – Attorneys' Eyes Only" or "Confidential" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order ("Protective Order"), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order.

5. Defendants' request to seal is narrowly tailored to the portions of their Opposition and its supporting papers that merit sealing.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this
2 17th day of October, 2017 in Washington, District of Columbia.

3
4 /s/ Michelle Yang

Michelle Yang

5
6
7 **ATTESTATION OF E-FILED SIGNATURE**

8 I, Arturo J. González am the ECF User whose ID and password are being used to file this
9 Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has
10 concurred in this filing.

11 Dated: October 17, 2017

/s/ Arturo J. González

ARTURO J. GONZÁLEZ